

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

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|---|---|------------------------|
| In re: |) | Chapter 11 |
| |) | |
| W. R. GRACE & CO., <u>et al.</u> , ¹ |) | Case No. 01-1139 (JJF) |
| |) | Jointly Administered |
| Debtors. |) | |

Objection Deadline: August 29, 2001 at 4:00 p.m.

CERTIFICATION OF COUNSEL RE: DOCKET NO. 792

1. The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to the *Application of Debtors for the Entry of an Order Authorizing the Retention and Employment of Casner & Edwards, LLP as Special Litigation Counsel* (the "Application"). The undersigned further certifies that he has

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc.), Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

reviewed the Court's docket in these cases, and no answer, objection or other responsive pleading to the Application appears thereon. Pursuant to the Notice, objections and responses to the Application were to be filed with Court and served on counsel for the Debtors on or before August 29, 2001.

2. The Official Committee of Unsecured Creditors (the "Creditors' Committee") did, however, provide informal comments to the proposed order granting the Application. In response to the Creditors' Committee's comments, the Debtors have revised the proposed form of order to clarify that only allowed "postpetition" fees and expenses of Casner & Edwards, LLP shall be an administrative expense of the Debtors' estates. The revised order is attached hereto as Exhibit A.

3. Accordingly, the Debtors respectfully request that the Court enter the revised order attached hereto at the Court's earliest convenience..

Dated: September 12, 2001

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